

Financial Institution Name:	ODDO BHF AG	
Location (Country) :	Frankfurt/Main (Germany)	

No#	Question	Answer
1. EN	TITY & OWNERSHIP	
1	Full Legal name	ODDO BHF Aktiengesellschaft
2	Append a list of branches which are covered by this questionnaire	ODDO BHF AG and its branches in Frankfurt, Berlin, Baden-Baden, Munich, Hannover, Hamburg, Essen, Köln, Mainz, Münster, Nürnberg, Stuttgart, Düsseldorf
3	Full Legal (Registered) Address	Bockenheimer Landstraße 10 60323 Frankfurt/Main Germany
4	Full Primary Business Address (if different from above)	-
5	Date of Entity incorporation / establishment	01.01.1970
6	Select type of ownership and append an ownership chart if available	
6 a	Publicly Traded (25% of shares publicly traded)	No
6 a1	If Y, indicate the exchange traded on and ticker symbol	
6 b	Member Owned / Mutual	No
6 c	Government or State Owned by 25% or more Privately Owned	No Yes
6 d 6 d1	If Y, provide details of shareholders or ultimate beneficial owners with a holding of 10% or more	Philippe Oddo, 28%
7	% of the Entity's total shares composed of bearer shares	0
8	Does the Entity, or any of its branches, operate under an Offshore Banking License (OBL) ?	No
8 a	If Y, provide the name of the relevant branch/es which operate under an OBL	

	L OTE & DANIOTIONS DESCRIPTION	
	L, CTF & SANCTIONS PROGRAMME	
9	Does the Entity have a programme that sets	
	minimum AML, CTF and Sanctions standards	
_	regarding the following components:	
9 a	Appointed Officer with sufficient experience /	V
0.1-	expertise	Yes Yes
9 b	Cash Reporting CDD	
9 c 9 d	EDD	Yes
9 u 9 e	Beneficial Ownership	Yes
9 e 9 f	Independent Testing	Yes Yes
	Periodic Review	Yes
9 g 9 h	Policies and Procedures	Yes
-	Risk Assessment	Yes
9 i	Sanctions	
9 j 9 k	PEP Screening	Yes Yes
9 K 9 I	Adverse Information Screening	Yes
9 m	Suspicious Activity Reporting	
9 m 9 n	Training and Education	Yes Yes
9 n 9 o	Transaction Monitoring	Yes
10	Is the Entity's AML, CTF & Sanctions policy	Tes
10	approved at least annually by the Board or	
	equivalent Senior Management Committee?	Yes
11	Does the Entity use third parties to carry out any	165
	components of its AML, CTF & Sanctions	
	programme?	No
11a	If Y, provide further details	
	TI BRIBERY & CORRUPTION	
12	Has the Entity documented policies and	
	procedures consistent with applicable ABC	
	regulations and requirements to [reasonably]	
	prevent, detect and report bribery and	Vaa
12	corruption? Does the Entity's internal audit function or other	Yes
13	independent third party cover ABC Policies and	
	Procedures?	Yes
14	Does the Entity provide mandatory ABC training	105
14	to:	
14 a	Board and Senior Committee Management	Yes
14 b	1st Line of Defence	Yes
14 C	2nd Line of Defence	Yes
14 d	3rd Line of Defence	Yes
14 u	3rd parties to which specific compliance	100
146	activities subject to ABC risk have been	
	outsourced	Yes
14 f	Non-employed workers as appropriate	1.00
	(contractors / consultants)	Yes
	(·

LICIES & PROCEDURES	
	Yes
	Yes
	Yes
Does the Entity have policies and procedures	
that:	
Prohibit the opening and keeping of anonymous	
	Yes
unlicensed banks and / or NBFIs	Yes
Prohibit dealing with other entities that provide	1.000
<u> </u>	Yes
Prohibit accounts / relationships with shell banks	
	Yes
Prohibit dealing with another Entity that provides	
	Yes
Section 311 designated entities	No
Prohibit opening and keeping of accounts for any	
	Yes
including their family and close associates	Yes
Define escalation processes for financial crime	100
•	
Holk 1004C0	Yes
Specify how potentially suspicious activity	
identified by employees is to be escalated and	
investigated	Yes
Outline the processes regarding screening for	
sanctions, PEPs and negative media	
-	Yes
•	
boundary around their business?	
	Yes
Does the Entity have a record retention	
procedures that comply with applicable laws?	Yes
If Y, what is the retention period?	5 years or more
	Prohibit the opening and keeping of anonymous and fictitious named accounts Prohibit the opening and keeping of accounts for unlicensed banks and / or NBFIs Prohibit dealing with other entities that provide banking services to unlicensed banks Prohibit accounts / relationships with shell banks Prohibit dealing with another Entity that provides services to shell banks Prohibit opening and keeping of accounts for Section 311 designated entities Prohibit opening and keeping of accounts for any of unlicensed / unregulated remittance agents, exchanges houses, casa de cambio, bureaux de change or money transfer agents Assess the risks of relationships with PEPs, including their family and close associates Define escalation processes for financial crime risk issues Specify how potentially suspicious activity identified by employees is to be escalated and investigated Outline the processes regarding screening for sanctions, PEPs and negative media Has the Entity defined a risk tolerance statement or similar document which defines a risk boundary around their business? Does the Entity have a record retention procedures that comply with applicable laws?

5. KY0	C, CDD and EDD	
	Does the Entity verify the identity of the	
	customer?	Yes
20	Do the Entity's policies and procedures set out	
	when CDD must be completed, e.g. at the time	
	of onboarding or within 30 days	Yes
21	Which of the following does the Entity gather and	
	retain when conducting CDD? Select all that	
21 a	apply: Ownership structure	
21 b	Customer identification	Yes
		Yes
	Expected activity	Yes
	Nature of business / employment	Yes
21 e	Product usage	Yes
21 f	Purpose and nature of relationship	Yes
21 g	Source of funds	Yes
21 h	Source of wealth	Yes
22	Are each of the following identified:	1,00
22 a	Ultimate beneficial ownership	Yes
22 a1	Are ultimate beneficial owners verified?	
22 b	Authorised signatories (where applicable)	Yes
22 c	Key controllers	Yes
22 d	Other relevant parties	Yes
	•	
23	Does the due diligence process result in	
23	customers receiving a risk classification?	
0.4	Door the Futitularies a viel based annuage to	Yes
24	Does the Entity have a risk based approach to screening customers and connected parties to	
	determine whether they are PEPs, or controlled	
	by PEPs?	
25	Does the Entity have policies, procedures and	Yes
[~	processes to review and escalate potential	
	matches from screening customers and	
	connected parties to determine whether they are PEPs, or controlled by PEPs?	
	i Li 3, di controlled by i LF3:	Yes
26	Does the Entity have a process to review and	
	update customer information based on:	
26 a	KYC renewal	Yes
26 b	Trigger event	Yes
27	From the list below, which categories of	1.00
	customers or industries are subject to EDD and /	
	or are restricted, or prohibited by the Entity's FCC programme?	
	Non-account customers	EDD on a risk based approach
27 b	Offshore customers	
		EDD & Restricted on a rick based approach
		EDD & Restricted on a risk based approach

Wolfsberg Group Financial Crime Compliance Questionnaire (FCCQ) v1.0

la=	Ob all bands	1
27 с	Shell banks	Prohibited
27 d	MVTS/ MSB customers	Prohibited
27 е	PEPs	EDD on a risk based approach
27 f	PEP Related	EDD on a risk based approach
27 g	PEP Close Associate	EDD on a risk based approach
27 h	Correspondent Banks	EDD & Restricted on a risk based approach
27 h1	If EDD or EDD & Restricted, does the EDD assessment contain the elements as set out in the Wolfsberg Correspondent Banking Principles 2014?	Yes
27 i	Arms, defense, military	EDD & Restricted on a risk based approach
27 j	Atomic power	EDD & Restricted on a risk based approach
27 k	Extractive industries	EDD & Restricted on a risk based approach
27 I	Precious metals and stones	EDD & Restricted on a risk based approach
27 m	Unregulated charities	EDD & Restricted on a risk based approach
27 n	Regulated charities	EDD & Restricted on a risk based approach
27 o	Red light business / Adult entertainment	EDD & Restricted on a risk based approach
27 p	Non-Government Organisations	EDD & Restricted on a risk based approach
27 q	Virtual currencies	EDD & Restricted on a risk based approach
27 r	Marijuana	Prohibited
27 s	Embassies / Consulates	EDD & Restricted on a risk based approach
27 t	Gambling	EDD & Restricted on a risk based approach
27 u	Payment Service Provider	EDD & Restricted on a risk based approach
27 v	Other (specify)	Companies which conduct their business mainly on a cash basis (i.e. restaurants, car dealers, art and antiques dealers), gold/ gemstone dealers, professional athletes (only natural person), scrap dealer/ waste collection, companies with reference to luxury yachts, real estate companies
28	If restricted, provide details of the restriction	Client acceptance only after approval of client acceptance committee. Transactions monitoring by business unit and Compliance on a risk based approach. Monitoring frequency depends on respective risk category, i.e. annually, twice a year, permanently.

Does the Entity have risk based policies, procedures and monitoring processes for the identification and reporting of suspicious activity? What is the method used by the Entity to monitor transactions for suspicious activities? 30 a Automated Yes To Combination of automated and manual No Does the Entity have regulatory requirements to report currency transactions? If Y, does the Entity have policies, procedures and processes to review and escalate matters arising from the monitoring of customer transactions and activity? 7. PAYMENT TRANSPARENCY 30 Does the Entity adhere to the Wolfsberg Group Payment Transparency Standards? Yes 4. Does the Entity have policies, procedures and processes to review and escalate matters arising from the monitoring of customer transactions and activity? 7. PAYMENT TRANSPARENCY 31 Does the Entity have policies, procedures and processes to review and escalate matters arising from the monitoring of customer transactions and activity? 7. PAYMENT TRANSPARENCY 33 Does the Entity adhere to the Wolfsberg Group Payment Transparency Standards? 4. Payment Transparency Standards? 5. PAYMENT TRANSPARENCY 34 Does the Entity have policies, procedures and processes to review and escalate matter as a single from the monitoring of customer transactions and activity? Fes The Payment Transparency Standards? The Payment Transparency Standards? The Payment Transparency Standards? Yes 5. Local Regulation Yes 4. Des the Entity have policies, procedures and processes to review and escalate matters are single from the monitoring of customer transactions and processes to review and escalate matters are single from the monitoring of customer transactions and activity? The Payment Transparency Standards? Yes	6. MO	NITORING & REPORTING	
procedures and monitoring processes for the identification and reporting of suspicious activity? Yes What is the method used by the Entity to monitor transactions for suspicious activities? Automated Yes Manual No Combination of automated and manual No 10 Does the Entity have regulatory requirements to report currency transactions? Yes 11 If y, does the Entity have policies, procedures and processes to comply with currency reporting requirements? 22 Does the Entity have policies, procedures and processes to review and escalate matters arising from the monitoring of customer transactions and activity? 7. PAYMENT TRANSPARENCY 33 Does the Entity have policies, procedures and processes to the the Wolfsberg Group Payment Transparency Standards? 44 Does the Entity have policies, procedures and processes to freasonably comply with and have controls in place to ensure compliance with: 45 PATF Recommendation 16 Yes Yes Yes Yes Specify the regulation			
identification and reporting of suspicious activity? Yes What is the method used by the Entity to monitor transactions for suspicious activities? 30 a Automated Yes No Combination of automated and manual No 10 Does the Entity have regulatory requirements to report currency transactions? Yes 11 a If Y, does the Entity have policies, procedures and processes to comptly with currency reporting requirements? 12 Does the Entity have policies, procedures and processes to review and escalate matters arising from the monitoring of customer transactions and activity? 7. PAYMENT TRANSPARENCY 33 Does the Entity have policies, procedures and processes to freasonably comply with and have controls in place to ensure compliance with: 4 a FATF Recommendation 16 Yes 4 Docal Regulation Yes Yes	-	procedures and monitoring processes for the	
What is the method used by the Entity to monitor transactions for suspicious activities? 30 a Automated Yes 30 b Manual No 30 c Combination of automated and manual No 31 Does the Entity have regulatory requirements to report currency transactions? 31 a If Y, does the Entity have policies, procedures and processes to comply with currency reporting requirements? 32 Does the Entity have policies, procedures and processes to review and escalate matters arising from the monitoring of customer transactions and activity? 7. PAYMENT TRANSPARENCY 33 Does the Entity adhere to the Wolfsberg Group Payment Transparency Standards? 44 Does the Entity have policies, procedures and processes to freasonably) comply with and have controls in place to ensure compliance with: 34 a FATF Recommendation 16 Yes 34 Does the regulation Yes Specify the regulation		identification and reporting of suspicious activity?	
What is the method used by the Entity to monitor transactions for suspicious activities? 30 a Automated Yes 30 b Manual No 31 Combination of automated and manual No 31 Does the Entity have regulatory requirements to report currency transactions? 31 a If Y, does the Entity have policies, procedures and processes to comply with currency reporting requirements? 32 Does the Entity have policies, procedures and processes to review and escalate matters arising from the monitoring of customer transactions and activity? 7. PAYMENT TRANSPARENCY 33 Does the Entity adhere to the Wolfsberg Group Payment Transparency Standards? 44 Does the Entity have policies, procedures and processes to [reasonably] comply with and have controls in place to ensure compliance with: 34 a FATF Recommendation 16 Yes 35 Specify the regulation			Voc
transactions for suspicious activities? 30 a Automated Yes 30 b Manual No 30 c Combination of automated and manual No 31 Does the Entity have regulatory requirements to report currency transactions? Yes 31 a If Y, does the Entity have policies, procedures and processes to comply with currency reporting requirements? 32 Does the Entity have policies, procedures and processes to review and escalate matters arising from the monitoring of customer transactions and activity? 7. PAYMENT TRANSPARENCY 33 Does the Entity adhere to the Wolfsberg Group Payment Transparency Standards? A Does the Entity have policies, procedures and processes to review and escalate matters arising from the monitoring of customer transactions and activity? Yes 7. PAYMENT TRANSPARENCY 34 Does the Entity have policies, procedures and processes to preasonably comply with and have controls in place to ensure compliance with: 34 a FATF Recommendation 16 Yes 34 b Local Regulations Yes Specify the regulation	30	What is the method used by the Entity to monitor	165
30 a Automated Yes 30 b Manual No 30 c Combination of automated and manual No 31 Does the Entity have regulatory requirements to report currency transactions? Yes 31 a If Y, does the Entity have policies, procedures and processes to comply with currency reporting requirements? Yes 32 Does the Entity have policies, procedures and processes to review and escalate matters arising from the monitoring of customer transactions and activity? 7. PAYMENT TRANSPARENCY 33 Does the Entity adhere to the Wolfsberg Group Payment Transparency Standards? 4 Does the Entity have policies, procedures and processes to review and escalate matters arising from the monitoring of customer transactions and activity? Yes 7. PAYMENT TRANSPARENCY 34 Does the Entity have policies, procedures and processes to [reasonably] comply with and have controls in place to ensure compliance with: 34 a FATF Recommendation 16 Yes 34 b Local Regulations Yes 35 Specify the regulation	30		
30 b Manual No 30 c Combination of automated and manual No 31 Does the Entity have regulatory requirements to report currency transactions? 31 a If Y, does the Entity have policies, procedures and processes to comply with currency reporting requirements? 32 Does the Entity have policies, procedures and processes to review and escalate matters arising from the monitoring of customer transactions and activity? 7. PAYMENT TRANSPARENCY 33 Does the Entity adhere to the Wolfsberg Group Payment Transparency Standards? A Does the Entity have policies, procedures and processes to review and escalate matters arising from the monitoring of customer transactions and activity? 7. PAYMENT TRANSPARENCY 34 Does the Entity adhere to the Wolfsberg Group Payment Transparency Standards? Yes 35 A Does the Entity adhere to the Wolfsberg Group Payment Transparency Standards? Yes 36 A Does the Entity adhere to the wolfsberg Group Payment Transparency Standards? Yes 37 A Does the Entity adhere to the Wolfsberg Group Payment Transparency Standards? Yes 38 Does the Entity adhere to the Wolfsberg Group Payment Transparency Standards? Yes 39 A Does the Entity adhere to the Wolfsberg Group Payment Transparency Standards? Yes 30 Does the Entity adhere to the Wolfsberg Group Payment Transparency Standards? Yes 39 Does the Entity adhere to the Wolfsberg Group Payment Transparency Standards? Yes 30 Does the Entity adhere to the Wolfsberg Group Payment Transparency Standards? Yes 31 Does the Entity adhere to the Wolfsberg Group Payment Transparency Standards? Yes 30 Does the Entity adhere to the Wolfsberg Group Payment Transparency Standards? Yes 31 Does the Entity adhere to the Wolfsberg Group Payment Transparency Standards? Yes 32 Does the Entity have policies, procedures and processes to review and escalate matters arising from the work of the Wolfsberg Mayment Transparency Transparency Standards? Yes 32 Does the Entity have policies, procedures and processes to the Wolfsberg Transparency Transparency Transpare		'	
30 b Manual No 30 c Combination of automated and manual No 31 Does the Entity have regulatory requirements to report currency transactions? Yes 31 a If Y, does the Entity have policies, procedures and processes to comply with currency reporting requirements? Yes 32 Does the Entity have policies, procedures and processes to review and escalate matters arising from the monitoring of customer transactions and activity? 7. PAYMENT TRANSPARENCY 33 Does the Entity adhere to the Wolfsberg Group Payment Transparency Standards? Yes 44 Does the Entity have policies, procedures and processes to [reasonably] comply with and have controls in place to ensure compliance with: 34 a FATF Recommendation 16 Yes 34 b Local Regulations Yes Yes	30 a	Automated	
30 b Manual No 30 c Combination of automated and manual No 31 Does the Entity have regulatory requirements to report currency transactions? Yes 31 a If Y, does the Entity have policies, procedures and processes to comply with currency reporting requirements? Yes 32 Does the Entity have policies, procedures and processes to review and escalate matters arising from the monitoring of customer transactions and activity? 7. PAYMENT TRANSPARENCY 33 Does the Entity adhere to the Wolfsberg Group Payment Transparency Standards? Yes 4. Does the Entity have policies, procedures and processes to [reasonably] comply with and have controls in place to ensure compliance with: 34 a FATF Recommendation 16 Yes 34 b Local Regulations Yes Yes			Yes
No 30 c Combination of automated and manual No 31 Does the Entity have regulatory requirements to report currency transactions? 31 a If Y, does the Entity have policies, procedures and processes to comply with currency reporting requirements? 32 Does the Entity have policies, procedures and processes to review and escalate matters arising from the monitoring of customer transactions and activity? 7. PAYMENT TRANSPARENCY 33 Does the Entity adhere to the Wolfsberg Group Payment Transparency Standards? 4 Does the Entity have policies, procedures and processes to review and escalate matters arising from the monitoring of customer transactions and activity? 7. PAYMENT TRANSPARENCY 34 Does the Entity have policies, procedures and processes to [reasonably] comply with and have controls in place to ensure compliance with: 34 a FATF Recommendation 16 Yes 34 b Local Regulations Yes Specify the regulation	30 b	Manual	
30 c Combination of automated and manual No 31 Does the Entity have regulatory requirements to report currency transactions? 13 a If Y, does the Entity have policies, procedures and processes to comply with currency reporting requirements? 13 Does the Entity have policies, procedures and processes to review and escalate matters arising from the monitoring of customer transactions and activity? 14 PAYMENT TRANSPARENCY 15 Does the Entity adhere to the Wolfsberg Group Payment Transparency Standards? 16 Does the Entity have policies, procedures and processes to [reasonably] comply with and have controls in place to ensure compliance with: 16 April 17 Payment Transparency Standards? 17 Payment Transparency Standards? 18 Does the Entity have policies, procedures and processes to [reasonably] comply with and have controls in place to ensure compliance with: 18 April 28 Payment Transparency Standards? 19 Payment Transparency Standards? 20 Payment Transparency Standards? 21 Payment Transparency Standards? 22 Payment Transparency Standards? 23 Payment Transparency Standards? 24 Payment Transparency Standards? 25 Payment Transparency Standards? 26 Payment Transparency Standards? 26 Payment Transparency Standards? 26 Payment Transparency Standards? 27 Payment Transparency Standards? 28 Payment Transparency Standards? 29 Payment Transparency Standards? 29 Payment Transparency Standards? 20 Payment Transparency Standards? 21 Payment Transparency Standards? 22 Payment Transparency Standards? 23 Payment Transparency Standards? 24 Payment Transparency Standards? 25 Payment Transparency Standards? 26 Payment Transparency Standards? 27 Payment Transparency Standards? 28 Payment Transparency Standards? 29 Payment Transparency Standards? 20 Payment T			
31 Does the Entity have regulatory requirements to report currency transactions? 31 a If Y, does the Entity have policies, procedures and processes to comply with currency reporting requirements? 32 Does the Entity have policies, procedures and processes to review and escalate matters arising from the monitoring of customer transactions and activity? 33 Does the Entity adhere to the Wolfsberg Group Payment Transparency Standards? 34 Does the Entity have policies, procedures and processes to freasonably) comply with and have controls in place to ensure compliance with: 34 a FATF Recommendation 16 34 b Local Regulations 34 b1 Specify the regulation			No
31 Does the Entity have regulatory requirements to report currency transactions? 31 a If Y, does the Entity have policies, procedures and processes to comply with currency reporting requirements? 32 Does the Entity have policies, procedures and processes to review and escalate matters arising from the monitoring of customer transactions and activity? 7. PAYMENT TRANSPARENCY 33 Does the Entity adhere to the Wolfsberg Group Payment Transparency Standards? 4 Does the Entity have policies, procedures and processes to [reasonably] comply with and have controls in place to ensure compliance with: 34 a FATF Recommendation 16 Yes 34 b Local Regulations Yes Yes	30 c	Combination of automated and manual	
31 Does the Entity have regulatory requirements to report currency transactions? 31 a If Y, does the Entity have policies, procedures and processes to comply with currency reporting requirements? 32 Does the Entity have policies, procedures and processes to review and escalate matters arising from the monitoring of customer transactions and activity? 7. PAYMENT TRANSPARENCY 33 Does the Entity adhere to the Wolfsberg Group Payment Transparency Standards? 4 Does the Entity have policies, procedures and processes to [reasonably] comply with and have controls in place to ensure compliance with: 34 a FATF Recommendation 16 Yes 34 b Local Regulations Yes Yes			No
report currency transactions? 31 a If Y, does the Entity have policies, procedures and processes to comply with currency reporting requirements? 32 Does the Entity have policies, procedures and processes to review and escalate matters arising from the monitoring of customer transactions and activity? 7. PAYMENT TRANSPARENCY 33 Does the Entity adhere to the Wolfsberg Group Payment Transparency Standards? 34 Does the Entity have policies, procedures and processes to [reasonably] comply with and have controls in place to ensure compliance with: 34 a FATF Recommendation 16 Yes 34 b Local Regulations Yes Yes Yes	31	Does the Entity have regulatory requirements to	
31 a If Y, does the Entity have policies, procedures and processes to comply with currency reporting requirements? 32 Does the Entity have policies, procedures and processes to review and escalate matters arising from the monitoring of customer transactions and activity? 7. PAYMENT TRANSPARENCY 33 Does the Entity adhere to the Wolfsberg Group Payment Transparency Standards? 34 Does the Entity have policies, procedures and processes to [reasonably] comply with and have controls in place to ensure compliance with: 34 a FATF Recommendation 16 Yes 34 b Local Regulations Yes 35 Specify the regulation			Van
and processes to comply with currency reporting requirements? Does the Entity have policies, procedures and processes to review and escalate matters arising from the monitoring of customer transactions and activity? 7. PAYMENT TRANSPARENCY 33 Does the Entity adhere to the Wolfsberg Group Payment Transparency Standards? Yes 4 Does the Entity have policies, procedures and processes to [reasonably] comply with and have controls in place to ensure compliance with: 34 a FATF Recommendation 16 Yes 34 b Local Regulations Yes 34 b1 Specify the regulation	31 a	If V does the Entity have policies procedures	Tes .
requirements? Does the Entity have policies, procedures and processes to review and escalate matters arising from the monitoring of customer transactions and activity? 7. PAYMENT TRANSPARENCY 33 Does the Entity adhere to the Wolfsberg Group Payment Transparency Standards? Yes 4 Does the Entity have policies, procedures and processes to [reasonably] comply with and have controls in place to ensure compliance with: 34 a FATF Recommendation 16 Yes 34 b Local Regulations Yes 35 Yes	31 a		
Does the Entity have policies, procedures and processes to review and escalate matters arising from the monitoring of customer transactions and activity? 7. PAYMENT TRANSPARENCY 33 Does the Entity adhere to the Wolfsberg Group Payment Transparency Standards? 4 Does the Entity have policies, procedures and processes to [reasonably] comply with and have controls in place to ensure compliance with: 34 a FATF Recommendation 16 Yes 34 b Local Regulations Yes Yes			
processes to review and escalate matters arising from the monitoring of customer transactions and activity? 7. PAYMENT TRANSPARENCY 33 Does the Entity adhere to the Wolfsberg Group Payment Transparency Standards? Yes 34 Does the Entity have policies, procedures and processes to [reasonably] comply with and have controls in place to ensure compliance with: 34 a FATF Recommendation 16 Yes 34 b Local Regulations Yes 34 b1 Specify the regulation	20	'	Yes
from the monitoring of customer transactions and activity? 7. PAYMENT TRANSPARENCY 33 Does the Entity adhere to the Wolfsberg Group Payment Transparency Standards? Yes 34 Does the Entity have policies, procedures and processes to [reasonably] comply with and have controls in place to ensure compliance with: 34 a FATF Recommendation 16 Yes 34 b Local Regulations Yes 34 b1 Specify the regulation	32		
and activity? 7. PAYMENT TRANSPARENCY 33 Does the Entity adhere to the Wolfsberg Group Payment Transparency Standards? 4 Does the Entity have policies, procedures and processes to [reasonably] comply with and have controls in place to ensure compliance with: 34 a FATF Recommendation 16 4 yes 34 b Local Regulations 5 yes 34 b1 Specify the regulation			
7. PAYMENT TRANSPARENCY 33 Does the Entity adhere to the Wolfsberg Group Payment Transparency Standards? Yes 34 Does the Entity have policies, procedures and processes to [reasonably] comply with and have controls in place to ensure compliance with: 34 a FATF Recommendation 16 Yes 34 b Local Regulations Yes 34 b1 Specify the regulation			
Does the Entity adhere to the Wolfsberg Group Payment Transparency Standards? Yes Does the Entity have policies, procedures and processes to [reasonably] comply with and have controls in place to ensure compliance with: 4 a FATF Recommendation 16 Yes Local Regulations Yes Specify the regulation		•	<u> Yes</u>
Payment Transparency Standards? Yes Does the Entity have policies, procedures and processes to [reasonably] comply with and have controls in place to ensure compliance with: 34 a FATF Recommendation 16 Yes 34 b Local Regulations Yes 34 b1 Specify the regulation			
34 Does the Entity have policies, procedures and processes to [reasonably] comply with and have controls in place to ensure compliance with: 34 a FATF Recommendation 16 Yes 34 b Local Regulations Yes 34 b1 Specify the regulation	33		
processes to [reasonably] comply with and have controls in place to ensure compliance with: 34 a FATF Recommendation 16 Yes 34 b Local Regulations Yes 34 b1 Specify the regulation		Payment Transparency Standards?	Yes
controls in place to ensure compliance with: 34 a FATF Recommendation 16 Yes 34 b Local Regulations Yes 34 b1 Specify the regulation	34	Does the Entity have policies, procedures and	
34 a FATF Recommendation 16 Yes 34 b Local Regulations Yes 34 b1 Specify the regulation			
34 b Local Regulations Yes Yes 34 b1 Specify the regulation		controls in place to ensure compliance with:	
34 b Local Regulations Yes Yes 34 b1 Specify the regulation	04 -	FATE December delice 40	
34 b1 Specify the regulation	34 a	FATE Recommendation 16	Yes
34 b1 Specify the regulation	34 b	Local Regulations	Vas
	34 b1	Specify the regulation	
FU Funds Transfer Regulation 2015/847		open, mengaman	
FU Funds Transfer Regulation 2015/847			
IEU Funds Transfer Regulation 2015/847			ELL For de Transfer De voleties 0045/047
34 c If N, explain	34 c	If N. explain	EU runus Transier Regulation 2015/84/
I I IV, CAPIAIII	J4 C	III IN, EAPIGIII	

0 67	NCTIONS	
35	Does the Entity have policies, procedures or	
33	other controls reasonably designed to prohibit	
	and / or detect actions taken to evade applicable	
	sanctions prohibitions, such as stripping, or the	
	resubmission and / or masking, of sanctions	
	relevant information in cross border	
	transactions?	
		Yes
36	Does the Entity screen its customers, including	
	beneficial ownership information collected by the	
	Entity, during onboarding and regularly thereafter	
	against Sanctions Lists?	Yes
37	Select the Sanctions Lists used by the Entity in	
	its sanctions screening processes:	
37 a	Consolidated United Nations Security Council	
	Sanctions List (UN)	Lland for according system are and bornelicial symptom and for filtering transportional data
37 b	United States Department of the Treasury's	Used for screening customers and beneficial owners and for filtering transactional data
37 5	Office of Foreign Assets Control (OFAC)	
	Cinco of Foreign Accord Control (Cr. 7.C)	Used for screening customers and beneficial owners and for filtering transactional data
37 c	Office of Financial Sanctions Implementation	
	HMT (OFSI)	
37 d	European Union Consolidated List (EU)	
	, ,	Used for screening customers and beneficial owners and for filtering transactional data
37 e	Other (specify)	
		Internal Deny lists, Worldcheck/Factiva
38	Does the Entity have a physical presence, e.g.,	Internal Bothy libra, Frontactioner activa
	branches, subsidiaries, or representative offices	
	located in countries / regions against which UN,	
	OFAC, OFSI, EU and G7 member countries	
	have enacted comprehensive jurisdiction-based	
	Sanctions?	No
0 TP	AINING & EDUCATION	
39	Does the Entity provide mandatory training,	
	which includes:	
39 a	Identification and reporting of transactions to government authorities	
	government authorities	Yes
39 b	Examples of different forms of money	
	laundering, terrorist financing and sanctions	
	violations relevant for the types of products and	
	services offered	Yes
39 c	Internal policies for controlling money laundering,	1.00
	terrorist financing and sanctions violations	
		Yes
39 d	New issues that occur in the market, e.g.,	
	significant regulatory actions or new regulations	Yes
40	Is the above mandatory training provided to :	100
	, 01	
40 a	Board and Senior Committee Management	Yes
40 b	1st Line of Defence	
40 c	2nd Line of Defence	Yes
		Yes
40 d	3rd Line of Defence	Yes
40 e	3rd parties to which specific FCC activities have	
	been outsourced	No
40 f	Non-employed workers (contractors /	
	consultants)	Yes
10. Al	IDIT	1. ···
41	In addition to inspections by the government	
Ι''	supervisors / regulators, does the Entity have an	
	internal audit function, a testing function or other	
	independent third party, or both, that assesses	
	FCC AML, CTF and Sanctions policies and	
	practices on a regular basis?	Yes
	practices on a regular bacie.	1.00